

## IN THE CIRCUIT COURT FOR FREDERICK COUNTY, MARYLAND

MARGARET E. BATEMAN  
404 Ridge Road, Apt. #5  
Greenbelt, Maryland 20770

Plaintiff

VS.

EQUITY 28,618

CHARLES ALLEN WOODS  
Rt. 2  
Box 166 H  
Rocky Ridge, Maryland 21778

Defendant

BILL OF COMPLAINT FOR SALE OF REAL ESTATE IN LIEU OF PARTITION

The plaintiff, Margaret E. Bateman, by and through her attorney, Paul D. Murphy, respectfully represents unto this Honorable Court as follows:

1. That the parties hereto are adult citizens of the United States and the plaintiff resides in Prince George's County, Maryland, and the Defendant resides in Frederick County, Maryland.

2. That the plaintiff was formerly Margaret E. Woods, wife of Defendant. That the parties hereto were lawfully married to each other; and that a decree of divorce A Vinculo Matrimonii was entered between them in the Circuit Court for Prince George's County, Maryland, on the 29th of June, 1978, from which no appeal was taken.

3. That during their marriage the parties acquired certain real property as tenants by the entireties. Said real property, improved by premises located at Route 2, Rocky Ridge, Maryland, is described as:

All that part of a tract of land called "Branksome Hall", beginning at the end of the third line of the whole tract and running (1) N. 60 degrees West 26.0 rods to a stake now driven; (2) N. 15 1/2 degrees West 60.0 rods to a stake on the north side of a branch; (3) N. 54 7/8 degrees E. 20.8 rods to a stone formerly planted; (4) N. 15 1/2 degrees W. 67.3 rods to a stone formerly planted; (5) N. 54 7/8 degrees E. 50.6 rods to a stake; (6) 1/2 degrees, E., 44.7 rods to a stone; (7) S. 5 1/2 degrees E., 8.4 rods to a stake; thence reversely with five lines of division to exclude that part